

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS
CORPORATION,

Plaintiff,
v.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 2:13-cv-655-WCB
(LEAD CASE)

LOYALTY CONVERSION SYSTEMS
CORPORATION,

Plaintiff,
v.

DELTA AIR LINES, INC.,

Defendant.

Civil Action No. 2:13-cv-659-WCB

LOYALTY CONVERSION SYSTEMS
CORPORATION,

Plaintiff,
v.

FRONTIER AIRLINES, INC.

Defendant.

Civil Action No. 2:13-cv-660-WCB

LOYALTY CONVERSION SYSTEMS
CORPORATION,

Plaintiff,

v.

UNITED AIRLINES, INC.,

Defendant.

Civil Action No. 2:13-cv-665- WCB

LOYALTY CONVERSION SYSTEMS
CORPORATION,

Plaintiff,

v.

US AIRWAYS, INC.

Defendant.

Civil Action No. 2:13-cv-666-WCB

**DEFENDANTS' AMERICAN AIRLINES, INC., DELTA AIR LINES, INC.,
FRONTIER AIRLINES, INC., UNITED AIRLINES, INC., AND US AIRWAYS, INC.
RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION**

Defendants American Airlines, Inc., Delta Air Lines Inc., Frontier Airlines, Inc., United Airlines, Inc., and US Airways, Inc. (collectively, “Defendants”), submit this reply in response to Plaintiff’s Motion for Preliminary Injunction (Dkt. 91) filed on June 13, 2014 (“Motion”). Defendants agree that Plaintiff’s Motion is improper and should be denied for at least the reasons set forth in the Reply Motion concurrently filed herewith by co-Defendants Hawaiian Airlines, Inc., and Southwest Airlines Co. (Dkt. 92).

Plaintiff seeks an order barring Defendants from bringing unfair-competition claims or compulsory counterclaims in another court. The sole basis for Plaintiff’s Motion appears to be a letter sent from co-Defendant, Southwest Airlines. This letter, however, has no association with any of Defendants, nor standing alone does it provide any justification for the relief Plaintiff seeks. Plaintiff has not shown, or even described, any threatened or actual threat from Defendants that would justify such a remedy. Thus, for at least this additional reason, Plaintiff’s Motion should be denied.

Dated: June 30, 2014

Respectfully submitted,

/s/ Jennifer Parker Ainsworth

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**ATTORNEYS FOR DEFENDANTS
AMERICAN AIRLINES, INC., DELTA AIR
LINES, INC., FRONTIER AIRLINES, INC.,
UNITED AIRLINES, INC. AND US
AIRWAYS, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service, Local Rule CV-5(a), on this the 30th day of June, 2014.

/s/ Jennifer P. Ainsworth
Jennifer P. Ainsworth